

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

USA GYMNASTICS,

Plaintiff,

v.

GEDDERTS' TWISTARS USA
GYMNASTICS CLUB, INC., TWISTARS
USA, INC., JOHN GEDDERT, KATHRYN
GEDDERT, DONALD PETERS,
SOUTHERN CALIFORNIA ACRO TEAM,
INC., BMK PARTNERS LTD, BMK
TRAINING FACILITIES, LTD., KAROLYI
TRAINING CAMPS, LLC, BELA
KAROLYI, MARTHA KAROLYI,
KAROLYI'S ELITE, KAROLYI WORLD
GYMNASTICS, INC., RICHARD
CARLSON, and WORLD SPORT
CHICAGO.

Defendants.

Adversary Case No. 19-50075

**DECLARATION OF CHRISTOPHER J. SCHNEIDER IN SUPPORT
OF PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION**

I, Christopher J. Schneider, hereby declare:

1. I am a member with the law firm of Miller Johnson. USA Gymnastics ("USAG") has retained me as its outside chief legal officer. I and other attorneys at my firm also serve in the

¹ The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

role of national coordinating counsel for USAG overseeing the defense of the Larry Nassar-related lawsuits and other lawsuits filed against USAG.

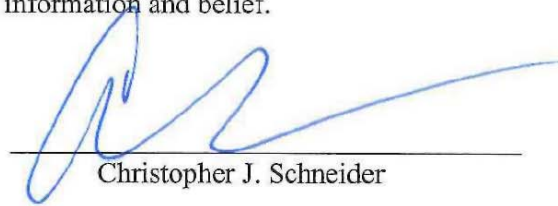
2. I submit this declaration (the “**Declaration**”) in support of *Plaintiff’s Motion for a Preliminary Injunction* (the “**Motion**”) filed contemporaneously herewith.

3. I have read the allegations of the Adversary Complaint and the Motion, and the statements made therein are true and accurate to the best of my knowledge, information, and belief.

4. Exhibits A, B, C, D, and E attached to the Motion are true and accurate listings of the lawsuits naming the defendants as co-defendants. Exhibits F, H, and I attached to the Motion are true and accurate copies of letters sent and received related to the lawsuits in which the defendants are named as co-defendants with USAG. Exhibit G attached to the Motion is a true and accurate copy of a lawsuit filed by certain of the defendants against USAG in Walker County, Texas. I make these statements to the best of my knowledge, information, and belief.

I declare under penalty of perjury as provided in 28 U.S.C. § 1746 that the foregoing is true and correct according to the best of my knowledge, information and belief.

Dated: March 29, 2019



Christopher J. Schneider